

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVE ANTHONY SHAND,

Defendant.

Crim. No. 22-40 (JRT/LIB)

**JOINT MOTION FOR
CONTINUANCE AND
EXCLUSION OF TIME UNDER
THE SPEEDY TRIAL ACT,
18 U.S.C. § 3161 *et seq.***

The United States of America and Steve Anthony Shand, by and through his undersigned attorney, respectfully move the Court for an order continuing this matter for trial on a date to be set and excluding time from computation under the Speedy Trial Act as set forth below. In support of the motion, the parties submit:

1. This is a complex matter;
2. Trial is currently scheduled for February 20, 2024;
3. The United States has indicated the possibility of filing a superseding indictment, and additional time will allow the parties to prepare for possible further charges;
4. Additional time may enable all potential charges to be resolved without one or more separate indictments and therefore avoid the need for multiple trials;
5. The defendant is not in custody;
6. Counsel for the undersigned parties have recently completed trial and counsel for the Government is currently scheduled to begin trial on February 26, 2024; and
7. The continuance and exclusion of time are warranted pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii) because this case is complex and permitting the parties adequate

time to address the above issues will serve the ends of justice, which outweighs the interests of the public and the defendants in a speedy trial, in accordance with 18 U.S.C. § 3161(h)(7)(A).

The parties therefore request that this matter be continued for trial on a date to be scheduled and that the time from February 20, 2024, to said date be excluded from computation under the Speedy Trial Act, 18 U.S.C. § 3161 et seq. The parties believe a timer period of 30 days will be sufficient.

Dated: February 13, 2024.

Respectfully submitted,

ANDREW M. LUGER
United States Attorney
s/Laura Provinzino

By: Laura Provinzino
Assistant U.S. Attorney

s/ Aaron Morrison

AARON J. MORRISON
Assistant Federal Defender
Counsel for Steve Shand